

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

CHAVEZ LAW OFFICES, P.A.,
a New Mexico corporation,

Plaintiff,

vs.

Case No. 1:21-CV-00293-LF-SCY

TYLER TECHNOLOGIES, INC.,
a foreign corporation,

Defendant.

PLAINTIFF’S MOTION TO REMAND ACTION TO STATE COURT

Plaintiff, Chavez Law Offices, PA, moves for this Court to remand the above captioned matter to the Second Judicial District Court, Bernalillo County, State of New Mexico, Cause No. D-202-CV-2021-01248 on the basis that the amount in controversy does not exceed seventy five thousand dollars (\$75,000.00). 28 U.S.C. § 1332(a). Plaintiff clearly states in paragraph (F) of the Conclusion that Plaintiff’s damages do not exceed the amount of \$74,999.00.

Plaintiff submitted a copy of this Motion and a Stipulated Motion regarding this matter to defense counsel and objects to this Motion. Plaintiff respectfully requests that this Court enter an Order remanding the action to the Second Judicial District Court, Bernalillo County, State of New Mexico, Cause No. D-202-CV-2021-01248 and for attorney’s fees and costs for having to file this Motion.

Respectfully submitted,

CHAVEZ LAW OFFICES, P.A.

/s/ Gene N. Chavez
Gene N. Chavez
1220 5th St. NW
Albuquerque, NM 87102
505-243-4363
gene@chavezlawoffices.com

Attorney for Plaintiff

I hereby certify the foregoing was served via
the CM/ECF system on this 31st day of March,
2021, on all counsel of record.

/s/ Gene N. Chavez
Gene N. Chavez